

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**DEFENDANT, AUGUSTUS WRIGHT'S MOTION FOR BILL OF
PARTICULARS**

NOW COMES the defendant, AUGUSTUS WRIGHT (hereinafter, "defendant"), by and through his attorney, STANLEY L. HILL, and respectfully moves this Honorable Court for an order requiring the government to file a Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure as to the counts charged in the indictment against defendant including, but not limited, to the following:

1. The exact language or words allegedly used by the defendant indicating that he willingly and knowingly committed or agreed to commit offenses charged in the indictment.
2. The dates on which defendant allegedly committed charged offenses.
3. The locations at which defendant allegedly committed charged offenses.
4. The names and addresses of persons present and those able to see and/or hear defendant committing charged offenses.
5. The names of conspirators participating in each act of the conspiracy, all other acts committed by conspirators, alleged purpose of each act, where each act was committed and the date on which each such act was committed.

6. The date, time and location of the initial act committed by the defendant by which he manifested being part of the conspiracy.
7. The date, time and location of the final act committed by the defendant in furtherance of the conspiracy.
8. Whether government is charging defendant with aiding and abetting someone in a committing a crime.
9. The names of alleged identified, but not indicted, conspirators, including, but not limited to the names which became known since the return of the indictment and the names of other persons who could have been charged in the indictment.

WHEREFORE, the defendant, AUGUSTUS WRIGHT, respectfully requests that this Honorable Court enter an order requiring the government to file a Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

/s/ Stanley L. Hill

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